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11 Attorneys for Defendant
12 UNITED MICROELECTRONICS CORPORATION

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICRON TECHNOLOGY, INC.,

Plaintiff,

v.

UNITED MICROELECTRONICS
CORPORATION, FUJIAN JINHUA
INTEGRATED CIRCUIT CO., LTD.,
and DOES 1-10,

Defendants.

Case No. 3:17-CV-6932-MMC

**DECLARATION OF YI-HSIU CHEN
IN SUPPORT OF UNITED
MICROELECTRONIC CORPORATION'S
OPPOSITION TO PLAINTIFF MICRON
TECHNOLOGY, INC.'S MOTION TO
LIFT STAY**

Date: January 8, 2021
Time: 9:00 a.m.
Judge: Hon. Maxine M. Chesney
Courtroom: 7, 19th Floor

1 I, Yi-hsiu Chen, hereby declare as follows:

2 1. I, Yi-hsiu Chen, am Senior Manager, Legal Affairs at United Microelectronics
3 Corporation ("UMC").

4 2. Since July 8, 1992, I have been a licensed attorney in Taiwan. My practice has
5 included trial and appellate work in court throughout Taiwan.

6 3. I hold a Bachelor of Law Degree from National Taiwan University, and an LLM
7 degree from Duke University School of Law.

8 4. Since June 2019, I have been representing UMC as in-house counsel, working with
9 UMC's outside counsel in UMC's defense with respect to the criminal matter pending before the
10 Taichung District Court. UMC is a named defendant in that matter.

11 5. In addition to UMC, the following individuals are defendants in the criminal case
12 in the Taichung District Court: J.T. Ho, Kenny Wang, and L.T. Rong.

13 6. In my role as in-house counsel and a legal representative for UMC, I personally
14 attended the criminal court hearings in Taichung, Taiwan from November 2019 to April 2020.

15 7. On June 12, 2020, the Taichung District Court issued its trial decision. The Court
16 convicted UMC, J.T. Ho, Kenny Wang, and L.T. Rong.

17 8. UMC and individual defendants J.T. Ho, Kenny Wang, and L.T. Rong (all of whom
18 are named as co-conspirators in Micron's U.S. civil lawsuit Second Amended Complaint against
19 UMC) have appealed. I have been involved in UMC's efforts to appeal the Taichung District
20 Court's decision.

21 9. In addition to UMC's appeal, the appeals by Mr. Wang, Mr. Ho, and Mr. Rong
22 remain pending.

23 10. Separately, I am familiar with UMC's interactions with Fujian Jinhua Integrated
24 Circuit Company ("Jinhua"). After Jinhua was listed on the U.S. Department of Commerce Entity
25 List in November 2018, UMC refrained from any further technical cooperation or technical
26 development work with Jinhua.

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3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct to the best of my knowledge and belief.

5 Executed this 18th day of December 2020, in Hsinchu, Taiwan.
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12 Yi-hsiu Chen
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